

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

2020 MCLAREN 600LT SPIDER, ET AL.,

Defendants.

**8:22CV240**

**NOTICE OF COMPLAINT  
FOR FORFEITURE *IN REM***

TO: Potential Claimant  
***Sent via U.S. Mail and Certified Mail***

1. DATE OF NOTICE AND MAILING: July 1, 2022.

2. FORFEITURE COMPLAINT: On July 1, 2022, the United States filed a civil Complaint in the United States District Court for the District of Nebraska seeking forfeiture *in rem* against the defendant property: 2020 McLaren 600LT Spider VIN#SBM13SAA5LW007680; 2022 GMC Sierra-K2600 AT4 4x4 VIN#1GT49PEYXNF163905; 2022 GMC Sierra-K2500 AT4 CC 4x4 VIN#1GT49PEY5NF145456; \$74,743.00 United States Currency; Farmers NW Life Insurance Policy Number 009138164; Farmers NW Life Insurance Policy Number 009165409; Farmers NW Life Insurance Policy Number 006704990V; Zenith EL Primero Watch Item Number 1ZNTH0007; Hublot Bing Bang Watch Item Number WHBG0129; Breitling Navitimer 43mm Watch Item Number WBTG1778; Rolex Daytona Watch 116509 Serial Number 65S626F8 21749; Rolex Oyster Perpetual Watch Serial Number X64G6926 AF124300X6; Rolex Oyster Perpetual Watch Serial Number 259G7053 2831-7351-4857; 18K Yellow Gold Hockey Goalie pendant with diamonds and yellow gold chain; 18K white gold adjustable chain and four hearts solitaire pendants; Rolex Oyster Perpetual Watch Serial Number X5965319 22244; 18K Yellow Gold Hockey Player pendant with diamonds and gold chain; 18K White Gold Bull Rider pendant with diamonds and chain; 18kt White Gold Wide Diamond ring with sapphires; 18kt White Gold Ladys Ring with sapphires and diamonds; Rolex 40MM Oyster Perpetual Daytona White Mop8 Watch Serial Number C3J48934; Astron SS CSHN Brace Watch; ¼ ctw DIA 18" station necklace; 8.30 ctw DIA 18KW necklace; Rolex Oyster Perpetual Watch Serial Number 179E626; Breitling Aviator 8 Curtis Warhawk Watch Model# A133161AL1X1, Serial# 2989028; Omega Aqua Terra Limited Edition Watch; Omega Speedmaster Watch; Omega Seamaster Watch; Debrisogono Powerbreaker Watch; 17756 East Colt Drive, Queen Creek, Arizona; 980 County Road W, Space 1146, Fremont, Nebraska; 4859 South 136 Street, Omaha, Nebraska; 50% Interest in 2203 23<sup>rd</sup> Street, Columbus, Nebraska, pursuant to 21 U.S.C. § 881.

3. FILING A VERIFIED CLAIM: Because the United States is serving you with this Notice *via* Certified Mail and U.S. Mail, if you have an ownership interest in the Defendant property that you wish to assert, you must file a Verified Claim within ***thirty-five days*** after the date of this

Notice as required by Rule G(4)(b), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. If you fail to file a timely ***Verified*** Claim as required by Rule G(4) the United States will seek forfeiture of the Defendant property.

4. CONTENTS OF VERIFIED CLAIM: A Verified Claim must:

- (A) identify the specific property claimed;
- (B) identify the claimant and state the claimant's interest in the property; ***and***,
- (C) be signed by the claimant under penalty of perjury.

28 U.S.C. § 1746; Rule G(5)(a). If the Verified Claim is made on behalf of the person entitled to possession by an agent, bailee or attorney, it must state that the agent, bailee, or attorney is duly authorized to make the Verified Claim.

5. FILING AN ANSWER: If you file a Verified Claim, you must then ***also*** file an Answer to the Complaint as required by Rule G(5)(b), or a motion as provided by Rule 12 of the Federal Rules of Civil Procedure, within ***twenty-one days*** after filing the Verified Claim.

6. FILING WITH COURT AND SERVICE ON UNITED STATES: The Verified Claim and the Answer must be filed with the Office of the Clerk, United States District Court for the District of Nebraska, 111 South 18th Plaza, Suite 1152, Omaha, Nebraska 68102, ***and*** a copy of the Verified Claim and the Answer must be sent to Kimberly C. Bunjer, Assistant United States Attorney, 1620 Dodge Street, Suite 1400, Omaha, Nebraska 68102.

7. ADDITIONAL INFORMATION: Please see 18 U.S.C. § 983, 28 C.F.R. Part 9, and Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions for additional procedures and regulations regarding this forfeiture action.

**PLEASE ALSO NOTE: Failure to follow the rules, regulations and requirements outlined above may result in judgment by default in favor of the United States in this action. You may wish to seek legal advice to protect your interests.**

UNITED STATES OF AMERICA,  
Plaintiff

STEVEN A. RUSSELL  
Acting United States Attorney

By: s/ Kimberly C. Bunjer  
KIMBERLY C. BUNJER, #20962

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